



September 16, 2019

Project No. 30405040

VIA ELECTRONIC MAIL

Ms. Raji Josiam  
Remedial Project Manager, 6SF-RA  
U.S. Environmental Protection Agency Region 6  
1201 Elm Street, Suite 500, SEDRA  
Dallas, Texas 75270-2102

Re: **BI-MONTHLY PROGRESS REPORT – SEPTEMBER 2019**  
**AREA OF INVESTIGATION 1 (AOI-1) REMEDIAL INVESTIGATION/FEASIBILITY STUDY**  
**US OIL RECOVERY SUPERFUND SITE**  
**400 N RICHEY/200 N RICHEY**  
**PASADENA, TEXAS**

Dear Ms. Josiam:

Pursuant to Section IX, Paragraph 44 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Golder Associates Inc. (Golder) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

1. Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period – During the preceding two-month period (July-August) the Respondents performed additional work for the RI/FS in accordance with the RI/FS Work Plan, as follows:
  - Submitted the Potential Human Health Fish Ingestion Pathway Evaluation and Estuarine Habitat Screening-Level Ecological Risk Assessment (SLERA) drafts to EPA for review;
  - Submitted Draft and Final WRN-AOI-1-9 for additional soil and groundwater investigation to evaluate potential response actions (EPA approval received August 9, 2019);
  - Completed field investigation portion of work proposed in WRN-AOI-9.
2. Summary of quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period – No additional data were received from the laboratory (i.e. for the field investigation portion of WRN-AOI-1-9) during this period, thus an updated database or other materials are not included with this report.
3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion – The following work is planned for the next two months:
  - Perform validation and evaluation of data generated during the field portion of the work proposed in WRN-AOI-9 (updated database to be provided in the next Bi-Monthly Report after data validation complete); and
  - Address comments received from EPA and TCEQ on September 13, 2019 on Potential Human Health Fish Ingestion Pathway Evaluation and Estuarine SLERA documents and schedule meetings and conference calls to discuss the comments with EPA and TCEQ accordingly.
4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No delays or problems were encountered during this bi-monthly period.

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**Golder Associates Inc.**  
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Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Eric Pastor, P.E.  
Project Coordinator

cc: Mr. Lam Tran – Texas Commission on Environmental Quality  
Mr. Michael Cave – Texas Commission on Environmental Quality  
Mr. James Kendrick – NewFields  
Mr. Joe Biss – EHS Support  
Mr. Matthew Wickham – Golder  
Mr. Chip Wood - U.S. Fish and Wildlife Service